

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

GENERIC PHARMACEUTICALS PRICING
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL INDIRECT RESELLER PLAINTIFF (IRP)
ACTIONS

MDL 2724
16-md-2724
HON. CYNTHIA M. RUFE

CIVIL ACTIONS:
16-PV-27243
18-cv-2533
19-cv-6044

**SUPPLEMENTAL DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING
REQUESTS FOR EXCLUSION**

I, Cameron R. Azari, Esq., hereby declare and state as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am a nationally recognized expert in the field of legal notice and have served as an expert in hundreds of federal and state cases involving class action notice plans.

3. I am a Senior Vice President of Epiq Class Action and Claims Solutions, Inc. (“Epiq”) and the Director of Legal Notice for Hilsoft Notifications, a firm that specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans. Hilsoft Notifications is a business unit of Epiq. References to Epiq in this declaration include Hilsoft Notifications.

4. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business at Epiq.

OVERVIEW

5. This declaration provides an Amended Exclusion Report for the Apotex Settlement for *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, Case No. 16-md-2724 in the United States District Court for the Eastern District of Pennsylvania. On August 30, 2024, I submitted my *Declaration of Cameron R. Azari, Esq. Regarding Notice Program* (“Notice Plan Declaration”) which described the Notice Plan, detailed Hilsoft’s class action notice experience,

and attached Hilsoft's *curriculum vitae*. I also provided my educational and professional experience relating to class actions and my ability to render opinions on overall adequacy of notice plans. On February 6, 2025, I executed my *Declaration of Cameron R. Azari, Esq. Regarding Implementation and Adequacy of Notice Program* ("Implementation Declaration") which detailed the successful implementation of the Notice Plan, provided administration statistics, and attached the original Exclusion Report.

Requests for Exclusion

6. As detailed in my Implementation Declaration, the deadline to request exclusion from the Settlement was January 16, 2025.¹ In my Implementation Declaration, I report that as of February 4, 2025, Epiq had received **three** requests for exclusion and attached the Exclusion Report.

7. After my Implementation Declaration was filed with the Court, Epiq was made aware that a package with requests for exclusion dated January 15, 2025, was *not* delivered to Epiq to be processed and reported to the Court in my Implementation Declaration. Epiq partnered with Class Counsel and obtained a duplicate copy of the requests for exclusion from the attorney who sent the original missing package. Epiq is also in contact with the United States Postal Service ("USPS") who is conducting an investigation to determine why the package was not delivered to Epiq. The USPS is currently attempting to locate the missing package.

8. All facts indicate the requests for exclusion were made on time and in good faith and should be allowed. Class Counsel agree.

9. As of February 12, 2025, Epiq has received 153 total requests for exclusion (including the three previously reported to the Court in my Implementation Declaration and the 150 included in the missing request for exclusion package). The Amended Exclusion Report is included as **Attachment 1**.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 14, 2025.



Cameron R. Azari, Esq.

¹ There was a typographical error in my Implementation Declaration. The deadline to request exclusion from the Settlement was January 16, 2025, not January 16, 2024.

Attachment 1



In Re Generic Pharmaceuticals Pricing Antitrust Litigation
Apotex Amended Exclusion Report

Number	Name
1	Evan's Drug Inc
2	CIBD Pharmacy
3	The Family Clinic
4	Albany Area Primary Health Care, Inc.
5	Allina Health System
6	Armstrong County Memorial Hospital, d/b/a ACMH Hospital
7	Astera Health, f/k/a Tri-County Health Care
8	Augusta Health Care, Inc., d/b/a/ Augusta Health
9	Avera Health
10	Baptist Health
11	Baxter County Hospital, Inc., d/b/a/ Baxter Regional Medical Center
12	Baystate Health, Inc.
13	Beaufort Jasper Hampton Comprehensive Health Services, Inc.
14	Berkshire Health Systems, Inc.
15	Billings Clinic
16	Broad Top Area Medical Centers, Inc.
17	Cape Cod Healthcare, Inc.
18	Care New England Health System, d/b/a Care New England
19	CaroMont Health, Inc.
20	CentraCare Health System
21	Central Texas Community Health Centers, d/b/a/ CommUnityCare
22	Collier Health Services, Inc., d/b/a Healthcare Network
23	Community Health Center of Snohomish
24	Confluence Health
25	Conway Regional Health System
26	Cook County Hospital District, d/b/a North Shore Health
27	Cook Hospital
28	Crusaders Central Clinic Association
29	Dallas County Medical Center
30	Delta Memorial Hospital
31	Douglas County Hospital, d/b/a Alomere Health
32	Drew Memorial Hospital, Inc., d/b/a/ Drew Memorial Health System
33	Duval's Pharmacy
34	East Boston Neighborhood Health Center Corporation
35	Ely-Bloomenson Community Hospital
36	Erie Family Health Center, Inc.
37	Essentia Health



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Number	Name
38	Evangelical Community Health
39	Fairview Health Services
40	Fulton County Medical Center
41	Gillette Children's Specialty Healthcare
42	Glacial Ridge Health System
43	Granby Pharmacy, Inc., d/b/a Center Pharmacy
44	Great Lakes Bay Health Centers
45	Great Salt Plains Health Center, Inc.
46	Greater Lawrence Family Health Center
47	Health Partners of Western Ohio
48	HealthPoint
49	Hennepin Healthcare System, Inc.
50	Independence Health System
51	Intermountain Health Care, Inc.
52	International Community Health Services
53	Jackson-Madison County General Hospital District, d/b/a/ West Tennessee Healthcare
54	Kittson Healthcare
55	Knight Health Holdings LLC, d/b/a ScionHealth
56	Kootenai Hospital District
57	Lake Region Healthcare Corporation
58	Lakewood Health System
59	Lehigh Valley Health Network, Inc.
60	LifeCare Medical Center
61	Lifepoint Corporate Services, General Partnership
62	Lifespan Corporation
63	Logan Health
64	Longview Wellness Center, Inc., d/b/a Wellness Pointe
65	Lutheran Charity Association, d/b/a Jamestown Regional Medical Center
66	Madelia Health
67	Madison Health, f/k/a Madison Memorial Hospital
68	Madison Healthcare Services, d/b/a/ Madison Hospital
69	Main Line Health, Inc.
70	Marana Health Center, Inc.
71	Mary Rutan Hospital, d/b/a Mary Rutan Health
72	Mass General Brigham Incorporated
73	Mayo Clinic
74	MedCura Health, Inc.



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Number	Name
75	Meeker Memorial Hospital and Clinics
76	Memorial Hospital of Laramie County, d/b/a Cheyenne Regional Medical Center
77	Memorial Hospital of Sweetwater County
78	Memorial Sloan Kettering Cancer Center
79	Middlesex Health System, Inc., d/b/a Middlesex Health
80	MillCreek Community Hospital
81	Mille Lacs Health System
82	Montefiore Medical Center
83	Mount Nittany Health System
84	Mount Sinai Hospitals Group, Inc.
85	Murray County Medical Center
86	MVMEDSHOP, Inc., d/b/a/ Vineyard Scripts
87	Nationwide Children's Hospital
88	North Big Horn Hospital District
89	North Canyon Medical Center
90	North Memorial Health Care, d/b/a/ North Memorial Health
91	North Olympic Healthcare Network
92	Northern Itasca Hospital District, d/b/a Bigfork Valley
93	Northfield Hospitals + Clinics
94	Novant Health, Inc.
95	Nuvance Health
96	NYU Langone Hospitals
97	Ochsner Clinic Foundation
98	Olmsted Medical Center
99	Ortonville Area Health Services
100	Overlake Hospital Medical Center
101	PeaceHealth
102	Peak Vista Community Health Centers
103	Penn Highlands Healthcare
104	Perham Hospital District, d/b/a/ Perham Health
105	Pikeville Medical Center, Inc.
106	Providence St. Joseph Health
107	Pueblo Community Health Center, Inc.
108	Regional Health Services, d/b/a/ Glencoe Regional Health
109	Ridgeview Medical Center, Inc., d/b/a Ridgeview
110	River's Edge Hospital
111	Riverview Healthcare Association



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Number	Name
112	Roanoke Chowan Community Health Center
113	Rutherford County Primary Care Clinics, Inc., d/b/a Primary Care & Hope Clinic
114	RWJBarnabas Health, Inc.
115	Salem Community Hospital, d/b/a/ Salem Regional Medical Center
116	Sanford
117	Select Medical Corporation
118	SGOH Acquisition, Inc., d/b/a/ Ozarks Community Hospital
119	Shasta Community Health Center
120	Shawnee Health Service and Development Corporation
121	Sleepy Eye Medical Center
122	St. Clair Health Corp., d/b/a St. Clair Health
123	St. Luke's Health Network, Inc., d/b/a St. Luke's University Health Network
124	St. Luke's Hospital of Duluth
125	St. Luke's Health System of Idaho
126	St. Thomas Community Health Center
127	Stamford Health, Inc.
128	Stigler Health & Wellness Center, Inc.
129	Syringa Hospital Districts, d/b/a/ Syringa Hospital & Clinics
130	The Chautauqua Center, Inc.
131	The Children's Hospital Corporation, d/b/a Boston Children's Hospital
132	The Children's Hospital of Philadelphia
133	The DCH Health Care Authority, d/b/a/ DCH Health System
134	The Guthrie Clinic
135	The New York and Presbyterian Hospital
136	The Regents of the University of Michigan on behalf of University of Michigan Health
137	Thomas Jefferson University, d/b/a/ Jefferson Health
138	Tri-Area Community Health
139	UC Health, LLC, d/b/a UC Health
140	UF Health (Shands Teaching Hospital and Clinics, Inc. and Shands Jacksonville Medical Center, Inc.)
141	UHS of Delaware, Inc.
142	UMass Memorial Care, Inc.
143	United Hospital District
144	University Health Systems of Eastern Carolina, d/b/a ECU Health
145	Upham's Corner Health Committee, Inc., d/b/a Upham's Corner Health Center
146	UPMC
147	Valley Health System
148	Valor Health



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Number	Name
149	WakeMed, d/b/a WakeMed Health & Hospitals
150	Welia Health
151	Wellpath LLC
152	White River Health System, Inc., d/b/a/ White River Medical Center
153	Winona Health Services